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March 15, 2005

**SUMMARY OF  
*EX PARTE* PRESENTATION**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TWA325  
Washington, DC 20554

**Re: Presubscribed Interexchange Carrier Charges, CC Docket 02-53**

Dear Ms. Dortch:

Today, on behalf of the United States Telecom Association (USTA), I and ten representatives of USTA's member companies met with Judy Nitsche, Assistant Division Chief of the Pricing Policy Division, Jennifer McKee, Assistant Division Chief of the Pricing Policy Division, and Jim Lichford, R. L. Smith, and Richard Kwiatkowski of the Pricing Policy Division to discuss the Presubscribed Interexchange Carrier (PIC) Charges proceeding. Company representatives appearing in person at the meeting were Donna Epps and Joe DiBella of Verizon Communications, Toni Acton of SBC Communications, and Glenn Rabin of ALLTEL Corporation. The following USTA members participated in the meeting by conference call: Mary Henze and Steve Inman of BellSouth, Sue Kennedy and Vickie Harman of SBC Communications, Nan Shuey of North Pittsburgh Telephone Co., and Trent Boaldin of Epic Touch Co.

The purpose of the meeting was to urge the Commission to reconsider the 30-day deadline for requiring local exchange carriers to file tariffs modifying their PIC change charges. USTA expressed concern that the Commission's modification of PIC charges will require structural changes such as bifurcating PIC charges into manual and electronic charges and changing systems to charge 50 percent of the manual or electronic PIC change charge when a customer changes both the PIC and the intraLATA PIC at the same time -- which will require significantly more than 30 days to implement. In addition, USTA argued that making programming changes in billing and ordering systems to effectuate the new PIC charges, notifying customers, and training customer service representatives to administer the charges will affect implementation time.

Ms. Marlene Dortch

March 15, 2005

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In accordance with Section 1.1206(b)(2) of the Federal Communications Commission's rules, I am filing this letter electronically with your office for inclusion in the public record. Please feel free to telephone me at (202) 326-7223 with any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Indra Sehdev Chalk", written in a cursive style.

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Indra Sehdev Chalk  
Counsel

cc: Jennifer McKee  
Judy Nitsche  
Jim Lichford  
R. L. Smith  
Richard Kwiatkowski